

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

WILLIE E. JOHNSON,

CASE NO: 3:24-cv-00598-REP

Plaintiff,

vs.

District Judge Robert E. Payne

EXPERIAN INFORMATION
SOLUTIONS; TRANS UNION,
LLC; CAPITAL ONE BANK, N.A.;
and CAPITAL COMMUNITY BANK
Defendants.

**TRANS UNION LLC’S CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Trans Union, LLC (“Trans Union”), by counsel, hereby requests a thirty (30) day extension of time in which to file its response to Plaintiff’s Complaint [Doc. No. 1], and in support thereof states as follows:

1. On August 22, 2024, Plaintiff filed his Complaint in the above-referenced matter. [Doc. No. 1.]
2. On September 17, 2024, Trans Union was served with Plaintiff’s Complaint.
3. Trans Union’s current deadline to respond to the Complaint is October 8, 2024. See Fed. R. Civ. P. 12(a)(1)(A).
4. Good cause exists for Trans Union’s request to extend the current response deadline by 30 days, as Trans Union is still investigating Plaintiff’s claims, and Plaintiff and Trans Union are in the process of discussing potential early resolution.

5. Trans Union's deadline to respond to the Complaint has not been previously extended and this request is not made for improper delay.

6. Plaintiff's counsel stated that he does not oppose the requested extension.

7. No other deadlines will be affected by this extension.

WHEREFORE, Trans Union, LLC respectfully requests that the Court grant its Unopposed Motion For Extension Of Time To Respond To Plaintiff's Complaint by thirty (30) days, up to and including November 7, 2024.

Respectfully submitted,

/s/ Marc F. Kirkland

Marc F. Kirkland

Virginia Bar Number 96234

Attorneys for Trans Union LLC

Quilling, Selander, Lownds,

Winslett & Moser, P.C.

6900 N. Dallas Parkway, Suite 800

Plano, Texas 75024

Phone: (214) 560-5454

Fax: (214) 871-2111

mkirkland@qslwm.com

DATED: October 8, 2024

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2024, a copy of the foregoing was filed electronically using the CM/ECF system, which shall send a copy of such filing to counsel of record.

/s/ Marc F. Kirkland
Marc F. Kirkland
Virginia Bar Number 96234
Attorneys for Trans Union LLC
Quilling, Selander, Lownds,
Winslett & Moser, P.C.
6900 N. Dallas Parkway, Suite 800
Plano, Texas 75024
Phone: (214) 560-5454
Fax: (214) 871-2111
mkirkland@qslwm.com

S